

Frantangelo, Barbara K

From: Papelian, Joseph E
Sent: Thursday, March 10, 2016 1:22 PM
To: Larry Gangnes (gangnesl@lanepowell.com)
Cc: Frantangelo, Barbara K
Subject: Furukawa Third Party Subpoena to Delphi
Attachments: Wire Harness Defendants' Discovery Requests to Delphi - Clarification

Importance: High

Larry:

We are in receipt of your Subpoena served on Delphi Automotive Systems, LLC on February 23, 2016. I write to you seeking concurrence under Local Rule 7.1(a) to either withdraw the Subpoena, or to accept Delphi's proposal in my email of February 11, 2016 (copy attached). In that email I proposed Delphi would extract the 2006 – 2014 SAP transactional data and allow Ben Zenick of Zencos Consulting access to the data. A Delphi representative would be made available to Mr. Zenick for guidance and questions, at a rate of \$75 per hour, which you would agree to pay. Please note this offer included Furukawa reimbursing Delphi for its reasonable expenses.

I would appreciate receiving your response by the close of business tomorrow, March 11, 2016. If I don't hear from you I will assume you do not agree,

Sincerely,

Joe Papelian
248-813-2535